

Exhibit B

Laura Vartain Horn (SBN 258485)
KIRKLAND & ELLIS LLP
555 California Street, Suite 2700
San Francisco, CA 94104
Telephone: (415) 439-1625
laura.vartain@kirkland.com

Jessica Davidson (Admitted *Pro Hac Vice*)
Christopher D. Cox (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
Telephone: (212) 446-4800
jessica.davidson@kirkland.com
christopher.cox@kirkland.com

Allison M. Brown (Admitted *Pro Hac Vice*)
KIRKLAND & ELLIS LLP
2005 Market Street, Suite 1000
Philadelphia, PA 19103
Telephone: (215) 268-5000
alli.brown@kirkland.com

Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**[PROPOSED] REVISED PRETRIAL ORDER
NO. ##: ADDITIONAL DISCOVERY
RELATED TO RECEIPTS**

On December 28, 2023, the Court entered Pretrial Order No. 5, providing, *inter alia*, that “[a]ll Plaintiffs must produce to Defendants a bona fide ride receipt from an Uber trip connected to the alleged incident.” ECF No. 175. “For those cases where a receipt is not readily available, Plaintiffs’ counsel must disclose to Defendants,” among other things, “why the receipt is unavailable.” *Id.*

- a. The Court now further orders as follows: Where any Plaintiff who claims to have ordered the relevant ride themselves¹ has not submitted a ride receipt and Uber, as indicated by its Defense Fact Sheet, has not been able to substantiate the ride alleged by that Plaintiff, Uber may serve written notice on each such Plaintiff requiring that the Plaintiff comply with the procedures set forth in this Order.
- b. Within 30 days of receiving Uber’s written notice, the Plaintiff must either (i) produce a bona fide ride receipt to Defendants via MDL Centrality, or (ii) serve a statement indicating that the Plaintiff is unable to locate the receipt, explaining in detail the reasonable efforts that have been undertaken by Plaintiff to search their email and the Uber app for the receipt, and explaining why Plaintiff has been unable to locate the receipt.
- c. If a Plaintiff provides a receipt, Plaintiff shall verify under penalty of perjury that it is a bona fide ride receipt relating to the Uber trip relating to the allegations contained in Plaintiff’s complaint.
- d. If a Plaintiff serves a statement in lieu of a bona fide receipt, the statement shall identify the date of both the oldest and most recent Uber receipt available in their email and the date of both the oldest and most recent Uber receipt available in the Uber app. Such a statement must be verified under penalty of perjury by the Plaintiff.

¹ This Order shall not, however, apply to Plaintiffs who have previously claimed in this litigation that the ride was ordered by someone other than themselves.

e. A failure by a Plaintiff to provide the information required in this Order by the deadlines set forth above shall subject the Plaintiff to dismissal with prejudice.

Exhibit B-1 identifies Plaintiffs already identified by Uber who have not produced a bona fide ride receipt and who have provided either no explanation, a limited explanation, or a boilerplate explanation (identical or substantially identical to others submitted by other plaintiffs represented by the same attorney) for not doing so. Entry of this Order shall serve as the written notice described in paragraph (a) to the 90 Plaintiffs listed in Exhibit B-1 and automatically initiate the procedures set forth in this Order as to those 90 Plaintiffs.

IT IS SO ORDERED.

DATED: _____

CHARLES R. BREYER
United States District Judge

Exhibit B-1:

1.	2091	Cutter Law PC
2.	2106	Cutter Law PC
3.	2123	Cutter Law PC
4.	1184	Levin Simes, LLP
5.	1189	Levin Simes, LLP
6.	1121	Levin Simes, LLP
7.	1137	Levin Simes, LLP
8.	1154	Levin Simes, LLP
9.	1482	Nachawati Law Group
10.	1491	Nachawati Law Group
11.	1493	Nachawati Law Group
12.	1500	Nachawati Law Group
13.	1511	Nachawati Law Group
14.	1889	Williams Hart & Boundas, LLP
15.	1928	Williams Hart & Boundas, LLP

16. 1949	Williams Hart & Boundas, LLP
17. 1984	Williams Hart & Boundas, LLP
18. 2066	Williams Hart & Boundas, LLP
19. 2067	Williams Hart & Boundas, LLP
20. 2079	Williams Hart & Boundas, LLP
21. 2095	Cutter Law PC
22. 2127	Williams Hart & Boundas, LLP
23. 2128	Williams Hart & Boundas, LLP
24. 2133	Williams Hart & Boundas, LLP
25. 2186	Williams Hart & Boundas, LLP
26. 2221	Nachawati Law Group
27. 2227	Nachawati Law Group
28. 2231	Nachawati Law Group
29. 2232	Nachawati Law Group
30. 2241	Pulaski Law Firm, PLLC
31. 2253	Nachawati Law Group

32.	2255	Nachawati Law Group
33.	2256	Nachawati Law Group
34.	2257	Nachawati Law Group
35.	2259	Nachawati Law Group
36.	2261	Nachawati Law Group
37.	2263	Nachawati Law Group
38.	2264	Nachawati Law Group
39.	2395	Levin Simes, LLP
40.	2513	Levin Simes, LLP
41.	2682	Cutter Law PC
42.	2796	Nachawati Law Group
43.	2850	Williams Hart & Boundas, LLP
44.	2854	Williams Hart & Boundas, LLP
45.	2855	Williams Hart & Boundas, LLP
46.	2857	Williams Hart & Boundas, LLP
47.	2859	Williams Hart & Boundas, LLP

48.	2860	Williams Hart & Boundas, LLP
49.	2862	Williams Hart & Boundas, LLP
50.	2863	Williams Hart & Boundas, LLP
51.	2866	Williams Hart & Boundas, LLP
52.	2867	Williams Hart & Boundas, LLP
53.	2869	Williams Hart & Boundas, LLP
54.	2872	Williams Hart & Boundas, LLP
55.	2874	Williams Hart & Boundas, LLP
56.	2876	Williams Hart & Boundas, LLP
57.	2877	Williams Hart & Boundas, LLP
58.	2878	Williams Hart & Boundas, LLP
59.	2880	Williams Hart & Boundas, LLP
60.	2884	Williams Hart & Boundas, LLP
61.	2885	Williams Hart & Boundas, LLP

62.	2887	Williams Hart & Boundas, LLP
63.	2888	Williams Hart & Boundas, LLP
64.	2890	Williams Hart & Boundas, LLP
65.	2892	Williams Hart & Boundas, LLP
66.	2896	Williams Hart & Boundas, LLP
67.	2898	Williams Hart & Boundas, LLP
68.	2899	Williams Hart & Boundas, LLP
69.	2900	Williams Hart & Boundas, LLP
70.	2903	Williams Hart & Boundas, LLP
71.	2904	Williams Hart & Boundas, LLP
72.	2906	Williams Hart & Boundas, LLP
73.	3243	Levin Simes, LLP
74.	2293	Levin Simes, LLP
75.	2344	Levin Simes, LLP
76.	2367	Levin Simes, LLP
77.	2371	Levin Simes, LLP
78.	2385	Levin Simes, LLP

79.	2389	Levin Simes, LLP
80.	2482	Levin Simes, LLP
81.	2489	Levin Simes, LLP
82.	2512	Levin Simes, LLP
83.	2536	Levin Simes, LLP
84.	2537	Levin Simes, LLP
85.	2774	Kherkher Garcia
86.	1882	Williams Hart & Boundas, LLP
87.	1883	Williams Hart & Boundas, LLP
88.	2174	Williams Hart & Boundas, LLP
89.	2180	Williams Hart & Boundas, LLP
90.	2703	Cutter Law PC